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May 9, 2022

**VIA ECF**

Honorable Jessica S. Allen, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Astellas Pharma Inc., et al. v. Sandoz Inc.***  
**Case No. 2:21-cv-13177 (JMV-JSA)**

Dear Judge Allen:

Pursuant to the Court's March 22, 2022 Order (D.I. 41), the parties submit this joint status letter in advance of the May 11, 2022 Telephone Status Conference. There are currently no disputes that require the Court's intervention.

On April 6, 2022, the Court approved the parties' agreements regarding claim construction and granted permission to forego the claim construction deadlines in the Pretrial Scheduling Order. See D.I. 43.

The parties recently agreed to extend certain case deadlines by approximately 4 weeks to allow more time for substantial completion of document production, while maintaining existing time periods between litigation events. The Court approved the parties' proposed extensions in its April 26, 2022 Order (D.I. 45). Regarding fact discovery, the current deadlines for the substantial completion of document production and the close of fact discovery are July 15, 2022 and October 7, 2022, respectively.

As noted in the last joint status letter, Plaintiffs have already produced over 125,000 documents (over 1.4 million pages) in response to Defendant's document requests and/or pursuant to L. Pat. R. 3.2. See D.I. 40. Defendant's document production efforts are on-going.

Honorable Jessica S. Allen, U.S.M.J.

May 9, 2022

Page 2

Defendant has produced ANDA No. 216068 and correspondences between Defendant and FDA to date pertaining to that ANDA.

Fact discovery is ongoing.

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We look forward to appearing before Your Honor at the May 11 status conference.

Respectfully submitted,

*s/ Liza M. Walsh*

Liza M. Walsh

cc: All Counsel of Record (via ECF and Email)